UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN

UNITED STATES OF AMERICA,

Case No. 19-CR-20652-03

Plaintiff,

HON. DAVID M. LAWSON

v.

RAMI LAZEKI,

Defendant.

## **UNOPPOSED MOTION FOR PERMISSION TO TRAVEL TO SPAIN**

Rami Lazeki plead guilty to Conspiracy to Commit Health Care Fraud under 18 U.S.C. Section 1349, and was sentenced to 12 months and a day, followed by 2 years supervised release. Mr. Lazeki surrendered to Gilmer Federal Camp on January 2, 2024, and was released on August 9, 2024. Defendant is gainfully employed and has been making monthly payments toward his restitution. His supervised release is set to expire on August 9, 2026. Defendant has resided in Michigan since 2003.

Defendant's 14-year-old son plays in MLS NEXT, which is a premier youth soccer team in the United States. The team has qualified to play in the Donosti Cup in San Sebastian, Spain, this summer. Defendant respectfully seeks permission from the Court to travel with his son to Spain this summer to attend this event. The approximate dates of travel would be July 3 to July 15.

The United States does not take a position on Mr. Lazeki's request and defers to the discretion of the Court, with the caveat that if the motion is granted, the Court require Mr. Lazeki to provide both the Probation Department and the United States with his full travel itinerary and notify the Probation Department immediately upon his return. The U.S. Probation Department also does not take a position on this motion and defers to the discretion of the Court.

Respectfully Submitted,

/s/ Anjali Prasad Anjali Prasad (P75771) Attorney for Defendant 4190 Telegraph, St. 3000 Bloomfield Hills, MI 48304 (248) 733-5006

Dated: April 1, 2025

## **CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing document with the Clerk of the Court using the ECF system that will send notification of such filing to all registered parties.

/s/ Anjali Prasad Anjali Prasad (P75771)